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9 Attorneys for Defendants
Chang's Dynasty LLC and Alan Chang

10 **UNITED STATES DISTRICT COURT**

11 **FOR THE DISTRICT OF NEVADA**

12
13 The Spearmint Rhino Companies Worldwide,
Inc. and K-Kel, Inc.,

Civil Action No. 2:23-cv-02040-ART-BNW

Honorable Anne R. Traum

14 Plaintiffs,
15 vs.
16 Chang's Dynasty LLC and Alan Chang,
17 Defendants.
18

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
(THIRD AND FINAL REQUEST)**

19
20 Plaintiffs The Spearmint Rhino Companies Worldwide, Inc. and K-Kel, Inc. ("Plaintiffs")
21 and Defendants Chang's Dynasty LLC and Alan Chang ("Defendants") (collectively, "the
22 Parties") hereby stipulate as follows pursuant to LR IA 6-1 and LR 26-3:

23 **I. COMPLETED DISCOVERY**

24 The Parties continue to make progress in discovery. Both Parties have served and
25 answered written discovery requests and have produced multiple rounds of documents.
26 Defendants have taken the deposition of one key witness, and Plaintiffs are scheduled to take the
27 deposition of another key witness in the near future.

1 **II. REMAINING DISCOVERY**

2 The Parties have conferred and anticipate continuing to confer regarding outstanding
 3 discovery issues. The Parties expect to take 2-3 more individual depositions per side and a
 4 30(b)(6) deposition per side. Limited third-party subpoenas may also be needed. Once fact
 5 discovery is complete, the Parties expect to disclose experts and take expert depositions.

6 **III. THERE IS GOOD CAUSE TO EXTEND THE DISCOVERY DEADLINE**

7 The Parties have continued working diligently and cooperatively on discovery.
 8 However, the Parties do not expect to be able to complete fact discovery by the current deadline
 9 because of unexpected contingencies, including a December 2 trial setting received by
 10 Defendants' counsel after the previous order extending deadlines was entered, and because
 11 depositions were delayed due to an elderly witness contracting COVID and the parties working
 12 together to resolve some of their differences regarding document discovery. For these reasons,
 13 the Parties agree that good cause exists for an extension and respectfully request an extension of
 14 approximately 60 days of the fact discovery deadline and other schedule dates. The Parties agree
 15 that they will not make a further request to extend the discovery deadline.

16 **IV. PROPOSED EXTENSION**

	Current Deadline	New Deadline
Close of Fact Discovery	November 29, 2024	January 31, 2025
F.R.C.P. 26(a)(2) Disclosures	December 27, 2024	February 28, 2025
Disclosure of Rebuttal Experts	January 24, 2025	March 28, 2025
Expert Discovery Closes	February 21, 2025	April 25, 2025
Dispositive Motions	March 21, 2025	May 23, 2025
Pretrial Order	April 18, 2025	June 20, 2025, but if dispositive motions are timely filed, then the date for filing the joint pretrial order shall be suspended until thirty (30) days after decisions on any dispositive

1		motions, or upon further 2 order of the Court 3 extending the time 4 period in which to file the joint pretrial order
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5 Dated: November 4, 2024

STRADLING YOCOA CARLSON & RAUTH LLP

7 By: /s/ Douglas Q. Hahn (w/ permission)
8 Douglas Q. Hahn (admitted *pro hac vice*)

9 LEWIS ROCA ROTHGERBER CHRISTIE LLP
10 Meng Zhong, Esq.
Ogonna M. Brown, Esq.

11 *Attorneys for Plaintiffs The Spearmint Rhino*
12 *Companies Worldwide, Inc. and K-Kel, Inc.*

13 MAXWELL GOSS PLLC

15 By: /s/ Maxwell Goss
16 Maxwell Goss (admitted *pro hac vice*)

17 *Attorneys for Defendants*
18 *Chang's Dynasty LLC and Alan Chang*

19 **IT IS SO ORDERED:**

22

UNITED STATES MAGISTRATE JUDGE

23 Dated: _____

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on November 4, 2024, I electronically filed the foregoing
3 document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of
4 the foregoing document is being served via transmission of Notices of Electronic Filing generated
5 by CM/ECF.

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7 _____
8 /s/ Maxwell Goss
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